

UNITED STATES DISTRICT COURT

District of Arizona

In the Matter of the Search of:

SUBJECT PARCEL: USPS Express Mail parcel bearing USPS tracking number EJ945097145US, addressed to "Isaac Adams, 3305 8th St NE #109, Washington DC 20017," with a return address of "George and Barbara Stanza, 901 N. Trekell RD, Casa Grande, Az 85122." It is a white Express Mail envelope; weighing approximately 1 pound and 4 ounces; postmarked October 19, 2021; and bearing \$27.25 in postage.

SEARCH WARRANT

Case Number:

21-8300MB

TO: ANDREA BRANDON and any Authorized Officer of the United States

Affidavit having been made before me by Affiant, Andrea Brandon, UNITED STATES POSTAL INSPECTOR, on the premises known as:

SUBJECT PARCEL: USPS Express Mail parcel bearing USPS tracking number EJ945097145US, addressed to "Isaac Adams, 3305 8th St NE #109, Washington DC 20017," with a return address of "George and Barbara Stanza, 901 N. Trekell RD, Casa Grande, Az 85122." It is a white Express Mail envelope; weighing approximately 1 pound and 4 ounces; postmarked October 19, 2021; and bearing \$27.25 in postage,

in the District of Arizona there is now concealed certain property, namely, CONTROLLED SUBSTANCES AND/OR U.S. CURRENCY OR DOCUMENTS RELATING TO THE DISTRIBUTION OF CONTROLLED SUBSTANCES THROUGH THE UNITED STATES MAIL, IN VIOLATION OF TITLE 21, UNITED STATES CODE, SECTIONS 841(a)(1), 843(b) and 846, and/or TITLE 18, UNITED STATES CODE, SECTIONS 1956, AS EVIDENCE OF SAID VIOLATIONS.

I am satisfied that the Affidavit establishes probable cause to believe that the property so described is now concealed on the premises above-described and establishes grounds for the issuance of this warrant.

YOU ARE HEREBY COMMANDED to search on or before 12/1/21 (Date) (not to exceed 14 days) the premises named above for the property specified, serving this warrant and making the search in the daytime (6:00 a.m. to 10:00 p.m.), if the property be found there to seize same, leaving a copy of this warrant and receipt for the property taken, and to prepare a written inventory of the property seized and promptly return this warrant to any United States Magistrate Judge, District of Arizona as required by law.

Nov. 18, 2021 @ 9:37
Date and Time Issued

Phoenix, Arizona
City and State

HONORABLE JOHN Z. BOYLE
UNITED STATES MAGISTRATE JUDGE
Name and Title of Judicial Officer

[Signature]
Signature of Judicial Officer

SCANNED

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District of Arizona

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**APPLICATION AND AFFIDAVIT
FOR SEARCH WARRANT**

Case Number: 21-8300MB

I, ANDREA BRANDON, being duly sworn, depose and state as follows:

I am a UNITED STATES POSTAL INSPECTOR and have reason to believe that on the premises known as:

SUBJECT PARCEL: USPS Express Mail parcel bearing USPS tracking number EJ945097145US, addressed to "Isaac Adams, 3305 8th St NE #109, Washington DC 20017," with a return address of "George and Barbara Stanza, 901 N. Trekell RD, Casa Grande, Az 85122." It is a white Express Mail envelope; weighing approximately 1 pound and 4 ounces; postmarked October 19, 2021; and bearing \$27.25 in postage,

in the District of Arizona there is now concealed certain property, namely, CONTROLLED SUBSTANCES AND/OR U.S. CURRENCY OR DOCUMENTS RELATING TO THE DISTRIBUTION OF CONTROLLED SUBSTANCES THROUGH THE UNITED STATES MAIL, which is CONTRABAND, THE FRUITS OF CRIME, OR THINGS OTHERWISE CRIMINALLY POSSESSED,

in violation of Title 21, United States Code, Sections 841(a)(1), 843(b) and 846 and/or Title 18, United States Code, Sections 1956. The facts to support the issuance of a Search Warrant are as follows:

SEE ATTACHED AFFIDAVIT OF ANDREA BRANDON, WHICH IS MADE A PART HEREOF.

Authorized by AUSA Bruce R. Van Baren

BRUCE
VAN
BAREN
Digitally signed
by BRUCE VAN
BAREN
Date: 2021.11.17
15:12:19 -07'00'

Sworn telephonically and subscribed electronically.


(electronic signature)

Digitally signed by Andrea
Brandon
Date: 2021.11.17 15:08:20 -07'00'

Signature of Affiant – ANDREA BRANDON

Nov. 18, 2021 9:37 AM
Date

at Phoenix, Arizona
City and State

HONORABLE JOHN Z. BOYLE
UNITED STATES MAGISTRATE JUDGE
Name and Title of Judicial Officer


Signature of Judicial Officer

SCANNED

AFFIDAVIT AND STATEMENT OF PROBABLE CAUSE

I, Andrea Brandon, being duly sworn, hereby depose and state as follows:

1. I am a U.S. Postal Inspector and have been so employed since January 2006. I have completed a 12-week basic training course in Potomac, Maryland, which included training in the investigation of narcotics trafficking via the U.S. Mail. I am currently assigned to the Phoenix Division Prohibited Mailings Narcotics Team ("PMNT") in Arizona, which is responsible for investigating narcotic violations involving the U.S. Mail. My responsibilities include the detection and prevention of the transportation of controlled substances through the U.S. Mail. Part of my training as a Postal Inspector included narcotics investigative techniques, chemical field-testing, and training in the identification and detection of controlled substances being transported in the U.S. Mail.

2. I have assisted on numerous narcotics investigations of individuals for violations of Title 21, United States Code, Sections 841(a)(1) (Possession with Intent to Distribute a Controlled Substance), 843(b) (Use of a Communication Facility to Facilitate the Distribution of a Controlled Substance), and 846 (Conspiracy to Possess with Intent to Distribute a Controlled Substance). The facts and information contained in this Affidavit are based on my personal knowledge as well as that of other Postal Inspectors and law enforcement officers involved in this investigation as described below.

3. This Affidavit is made in support of an application for a search warrant for one United States Postal Service ("USPS") Express Mail Parcel (referred to hereafter as the "SUBJECT PARCEL"). **Based on a positive alert by a narcotics-detecting canine and the additional information provided below, I believe the SUBJECT PARCEL**

contains a controlled substance(s) and/or proceeds from the sale of controlled substances. However, because the purpose of this affidavit is merely to establish probable cause for the issuance of a search warrant, this Affidavit does not contain all of my knowledge regarding the **SUBJECT PARCEL**.

4. The **SUBJECT PARCEL** is further described as follows:

- a. **SUBJECT PARCEL:** One USPS Express Mail parcel bearing USPS tracking number EJ945097145US, addressed to “Isaac Adams, 3305 8th St NE #109, Washington DC 20017,” with a return address of “George and Barbara Stanza, 901 N. Trekell RD, Casa Grande, Az 85122.” It is a white Express Mail envelope; weighing approximately 1 pound and 4 ounces; postmarked October 19, 2021; and bearing \$27.25 in postage.

BACKGROUND

5. From my training and experience, as well as the training and experience of other Postal Inspectors on the PMNT, I am aware that the USPS mail system is frequently used to transport controlled substances and/or proceeds from the sale of controlled substances to areas throughout the United States. I also know that drug traffickers prefer mail/delivery services such as Express Mail and Priority Mail because of their reliability and the ability to track the article’s progress to the intended delivery point. When a drug trafficker learns that a mailed article has not arrived as scheduled, he/she becomes suspicious of any delayed attempt to deliver the item.

6. Based on my training and experience regarding Express Mail operations, I am aware that the Express Mail service was designed primarily to fit the needs of businesses by providing overnight delivery for time-sensitive materials. Moreover, based on my training and experience, I am aware that business mailings often: (a) contain typewritten labels; (b) are addressed to and/or from a business; (c) are contained within flat cardboard mailers; and (c) weigh less than eight ounces. In addition, the USPS developed corporate charge accounts to avoid time-consuming cash payments by businesses for business mailings.

7. Based on my training and experience, I am aware that the Priority Mail service was created as a less-expensive alternative to Express Mail overnight delivery, but designed to provide quicker, more reliable service than standard First Class Mail. Whereas a customer mailing an article via Express Mail expects next-day service, a customer who mails an article via Priority Mail can expect two-to-three-day delivery service. The USPS also provides a tracking service through a USPS tracking number, which allows the customer to track the parcel and confirm delivery.

8. Based on my training and experience regarding Priority Mail operations, I am aware that the majority of Priority Mail mailings are business mailings. Businesses have found that Priority Mail is a significantly less-expensive method of mailing than Express Mail, particularly when next-day service is not a requirement. I also know that (similar to Express Mail) Priority Mail business mailings tend to be smaller, lighter mailings, and on average, weigh less than two pounds. Examples of the typical types of

business mailings conducted via Priority Mail include books, clothing, pharmaceuticals, and consumer goods purchased from online retailers.

9. From my training, personal experience, and the collective experiences related to me by other Postal Inspectors on the PMNT who specialize in investigations relating to the mailing of controlled substances and proceeds from the sale of controlled substances, I am aware that Arizona is a source location for controlled substances based on its close proximity to the border between the United States and Mexico. As such, controlled substances are frequently transported from Arizona via USPS, and proceeds from the sale of controlled substances are frequently returned to Arizona via USPS.

10. Based on my training and experience regarding the use of Express Mail and Priority Mail to transport controlled substances and/or the proceeds from the sale of controlled substances, I am aware these illicit parcels usually contain some or all of the following characteristics:

- a. The parcel contains a label with handwritten address information and is addressed from one individual to another individual;
- b. The handwritten label on the parcel does not contain a business account number, thereby indicating that the sender likely paid cash;
- c. The parcel is heavier than the typical mailing, often weighing more than eight ounces for Express Mail, and two pounds for Priority Mail; and
- d. The parcel either: (a) was destined for an area known to be a frequent destination point for controlled substances, having been mailed from an area known to be a source area for controlled substances; or (b) originated

from an area known to be a frequent origination point for proceeds from the sale of controlled substances, having been mailed to an area known to be a destination area for proceeds from the sale of controlled substances

11. Express Mail and Priority Mail parcels found to meet any or all of the characteristics described above are often further scrutinized by Postal Inspectors through address verifications and an examination by a trained narcotics-detecting canine.

RELEVANT FACTS PERTAINING TO THE SUBJECT PARCELS

12. On November 16, 2021, your Affiant was alerted to a suspicious parcel at the Casa Grande Post Office located in Casa Grande, Arizona. Your Affiant responded to the Casa Grande Post Office to retrieve the parcel (**SUBJECT PARCEL**) for further examination. A review of postal records revealed the postage on Express Mail parcel bearing USPS tracking number EJ945097145US was purchased from a USPS Self Service Kiosk (“SSK”) inside the Four Peaks Post Office in Mesa, Arizona, on October 19, 2021 at approximately 8:35 a.m. Your Affiant is aware that SSK machines allow the customer to purchase postage and mail parcels without having to interact with postal employees. All postage and shipping labels are printed and dispensed at the SSK machine.

13. Express Mail parcel bearing USPS tracking number EJ945097145US entered the mail stream but was ultimately “returned to sender” due to inadequate postage. The sender address listed on the parcel (further described below) was a vacant house, so the parcel remained at the post office and was deemed to be “unclaimed.”

14. Upon physical examination of the **SUBJECT PARCEL**, the **SUBJECT PARCEL** met some of the characteristics listed above. Specifically, the **SUBJECT**

PARCEL was addressed from one individual to another individual, weighed approximately 1 pound and 4 ounces (which is heavier than the typical Express Mail parcel), and bore handwritten address label information. Also, the **SUBJECT PARCEL** was mailed to an address in Washington, D.C. from an address in Arizona. Based on my training, experience, and the collective experiences related to me by other Postal Inspectors on the PMNT who specialize in investigations relating to the mailing of controlled substances and proceeds from the sale of controlled substances, I am aware that Arizona is frequently a source location for controlled substances that are mailed to Washington, D.C., and that proceeds from the sale of controlled substances are frequently returned to Arizona from Washington, D.C. via USPS.

15. A database query was conducted regarding the names and addresses for the **SUBJECT PARCEL** in Consolidated Lead Evaluation and Reporting ("CLEAR"), a law enforcement database accessible to your Affiant. CLEAR associates addresses and telephone numbers to individuals and business entities. The CLEAR database is created from credit reports, law enforcement reports, utility records, and other public records.

16. Through the CLEAR database query, investigators learned that the delivery address for the **SUBJECT PARCEL** (3305 8th St. NE Apt. 109, Washington, D.C. 20017) is an existing, deliverable address, but that Isaac Adams is not associated with the address. The same database query revealed that the return address for the **SUBJECT PARCEL** (901 N. Trekell Rd., Casa Grande, AZ 85122) is an existing, deliverable address, but that George and Barbara Stanza are not associated with the address. The USPS letter carrier

who delivered to 901 N. Trekell Rd., Casa Grande, AZ 85122, stated the house was currently vacant.

17. From my training, personal experience, and the collective experiences related to me by other Postal Inspectors on the PMNT who specialize in investigations relating to the mailing of controlled substances, it is common for drug traffickers to use partial, unassociated, or fictitious names and addresses to evade detection by law enforcement.

CANINE EXAMINATION OF THE SUBJECT PARCELS

18. On November 17, 2021, Mesa Detective/Canine Handler Dawn Haynes and her canine, "Nicole," inspected the **SUBJECT PARCEL** in Phoenix, Arizona. Detective Haynes advised the **SUBJECT PARCEL** was separated and individually inspected by Nicole, at which time Nicole gave a positive alert to the **SUBJECT PARCEL** at 10:33 a.m. by lying down next to the parcel.

19. Detective Haynes described that when Nicole lays down next to an item as she did with the **SUBJECT PARCEL**, Nicole is exhibiting a "passive" alert that she has been trained to give. Detective Haynes stated that Nicole's "passive" alert indicates the presence within the **SUBJECT PARCEL** of narcotics or a controlled substance, or currency, notes, documents, or evidence bearing the presence of the odors of heroin, cocaine, marijuana, and/or methamphetamine.

20. Detective Haynes advised she is a Mesa Police Department Detective currently assigned to the handling and care of Mesa Police Department canine Nicole. Detective Haynes has been a police officer with Mesa Police for 20 years. Nicole is a four-year-old Belgian Malinois, who has been working drugs/narcotics detection for the Mesa

Police Department since February 2020. Nicole and Detective Haynes currently hold a National Certification in drugs/narcotics detection by the National Police Canine Association (“NPCA”) and were last certified on March 3, 2021. Detective Haynes’ certifications also include the completion of a canine certification course put on at the Alpha canine training facility. Nicole is trained to detect the odors of cocaine, marijuana, heroin, methamphetamine, and their derivatives.

21. Detective Haynes advised that, since Nicole began working at the Mesa Police Department, she (Nicole) has had over 100 successful finds (both training finds and finds that have contributed to active investigations) of controlled substances and/or the proceeds from the sales of controlled substances.

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CONCLUSION

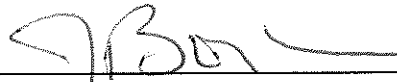
22. Based on these facts, there is probable cause to believe that the **SUBJECT PARCEL** described above contains controlled substances or proceeds from the sale of controlled substances, constituting evidence of violations of Title 21, United States Code, Sections 841(a)(1) (Possession with Intent to Distribute a Controlled Substance), 843(b) (Use of a Communication Facility to Facilitate the Distribution of a Controlled Substance), and 846 (Conspiracy to Distribute a Controlled Substance) and/or Title 18, United States Code, Section 1956 (Money Laundering).


(electronic signature)

Digitally signed by Andrea
Brandon
Date: 2021.11.17 15:08:42
+07'00'

ANDREA BRANDON
United States Postal Inspector

Subscribed electronically and sworn telephonically on this 17th day of November
2021 at 9:37am.



HONORABLE JOHN Z. BOYLE
United States Magistrate Judge